

Policy Change Considerations for Ecological Safeguards in the CAR Forest Protocol 3.1

The bullets are thoughts and questions to prompt discussion. The non bulleted language is extracted from the CAR Protocol.

- Consider a broad based policy statement that recognizes that the Washington Forest Practice Rules address these considerations and many others and that collectively the rules meet or exceed the intent of these requirements rather than to try to address individually as done below. Would still require a write up and comparison to support.
- Consider using FIA data to create and then monitor thresholds/trends for carbon, age, or habitat classes across a statewide range or ecoregion rather than on a project or landowner scale.

3.9.1 Sustainable Harvesting Practices

The Forest Owner must employ uneven-aged silvicultural practices and canopy retention averaging at least 40 percent across the forest, as measured on any 20 acres within the entire forestland owned by the Forest Owner, including land within and outside of the Project Area (Areas impacted by Significant Disturbance may be excluded from this test).

- How is this being implemented in practice?
 - Is Canopy Retention static (buffer) or can it be “mature” evenaged stands?
 - Do you have to meet this test on every 20 acres or is that the sample unit size?
- How close to this will Washington’s forest landownership get to this as a result of the existing regulatory structure (buffers) over time?

3.9.4 Balancing Age and Habitat Classes

For projects that employ even-aged management practices, harvesting must be limited to stands no greater than 40 acres. Stands adjacent to recently harvested stands must not be harvested using an even-aged harvest until the average age of the adjacent stand is at least 5-years old, or the average height in the adjacent stand is at least 5 feet.

- This mirrors California’s Forest Practice Rules for clearcut size and green up (adjacency).
- Consider using an average clearcut size limitation rather than a maximum?
- Evaluate other Washington regulatory drivers that address Age and Habitat Class to see if they can mitigate the larger clearcut acreage limitations identified in the rules.
 - Riparian buffers
 - Live and Snag retention
- Evaluate other Washington regulatory drivers that address other environmental considerations not contemplated in the protocol?

- Consider adjusting other requirements “up” to compensate for a more flexible clearcut size limitation.

On a watershed scale up to 10,000 acres, all projects must maintain, or make progress toward maintaining, no more than 40 percent of their forested acres in ages less than 20 years. Areas impacted by a Significant Disturbance are exempt from this test until 20 years after reforestation of such areas.

- Do Washington Forest landowners meet this standard in general?
- Is this something we could adjust “up” as compensation for other changes?

3.9.2 Natural Forest Management

Species Composition – Appendix F (California Only)

- Would need to be created for other forest types in other states.